

JAP:MKM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 11-1215

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C., §§ 952(a)
and 960)

CHRISTOPHER VALERIO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

TAMIKA COMRIE, being duly sworn, deposes and says that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about December 7, 2011, within the Eastern District of New York and elsewhere, the defendant CHRISTOPHER VALERIO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for her belief are as follows:^{1/}

1. On or about December 7, 2011, the defendant CHRISTOPHER VALERIO arrived at JFK International Airport ("JFK") in Queens, New York aboard Delta Airlines flight number 550 from Santo Domingo, Dominican Republic.

2. The defendant CHRISTOPHER VALERIO was selected for a Customs and Border Protection ("CBP") examination of his luggage. During that inspection, the defendant presented an "Astor" brand suitcase. When asked if the suitcase and everything in it belonged to him, the defendant responded "Yes."

3. During the examination of the suitcase, the CBP officer noticed that the rivets and screws on the suitcase appeared to have been tampered with. After removing the lining inside the suitcase, a white powdery substance spilled from within the plastic siding of the suitcase. The white powdery substance field tested positive for the presence of cocaine. The total approximate gross weight of the white powdery substance in the defendant CHRISTOPHER VALERIO's suitcase was 2,705.5 grams.

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant CHRISTOPHER VALERIO be dealt with according to law.



TAMIKA COMRIE
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
8th day of December, 2011

HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK